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May 31, 2024

VIA ECF

Honorable Ona T. Wang
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Patricia Rodney v. City of New York, et al., 22-cv-1445 (LAK)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, for defendants. Defendants write pursuant to the Court's orders to provide a status update on the progress of discovery.

As an update to defendants' April 26, 2024 status letter, defendants have further produced to plaintiff notices of claim for prior lawsuits against defendants, with respect to Plaintiff's Document Request No. 37. Defendants will produce a privilege log related to the personnel files with respect to Document Request No. 34, and apologize for the delay in production of those documents. As to outstanding discovery regarding ESI, defendants have produced all responsive e-mail documents to plaintiff regarding the agreed upon search terms, and do not have an update as to the collection of text messages for the agreed upon terms.

Thank you for your consideration herein.

Respectfully submitted,

/s/

John Schemitsch
Senior Counsel

cc: **VIA ECF**
All Counsel of Record